

EXHIBIT 34

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION) Case No.
OPIATE LITIGATION) 1:17-MD-2804
APPLIES TO ALL CASES) Hon. Dan A. Polster
-----x

VIDEOTAPED DEPOSITION OF GARY L. BOGGS

WASHINGTON, D.C.

THURSDAY, JANUARY 17, 2019

9:07 A.M.

Pages: 1 - 429
Reported by: Leslie A. Todd

1 dentist and have a tooth -- tooth extraction, and
2 the patient needs the medication for maybe a
3 couple of days, but the doctor writes it for
4 30 days. That's overprescribing.

5 Q So does the -- does McKesson's
6 compliance program target overprescribing, as
7 you've just described it?

8 A It -- it can't.

9 Q Why not?

10 A We don't see the prescription. We're
11 prohibited by law under HIPAA from knowing
12 anything about the patient or any consultation
13 between the patient and the doctor, and we don't
14 have access to prescription -- the prescription
15 itself.

16 Q You were asked some questions earlier
17 today about towns that received larger volumes of
18 pills relative to their population. Do you
19 remember some of those questions?

20 A I do.

21 Q Do you know if those numbers are the
22 result of diversion or of overprescribing?

23 A I don't.

24 MR. RAFFERTY: Objection.

Highly Confidential - Subject to Further Confidentiality Review

ACKNOWLEDGMENT OF DEPONENT

I, Gary Boggs, do hereby
certify that I have read the foregoing pages, and
that the same is a correct transcription of the
answers given by me to the questions therein
propounded, except for the corrections or changes
in form or substance, if any, noted in the
attached Errata Sheet.

Gary L. Boggs 2/25/19
GARY L. BOGGS DATE

Subscribed and sworn to
before me this

25th day of February, 2019.

My commission expires: 12/09/2020

Daniel Stybel Daniel Stybel

Notary Public

DANIEL STYBEL
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF WAYNE
MY COMMISSION EXPIRES DEC 9, 2020
ACTING IN COUNTY OF Wayne

